

## MEMO ENDORSED

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November 29, 2012

VIA EMAIL

The Honorable Richard J. Sullivan  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 615  
New York, New York 10007  
Email: [sullivanysdchambers@nysd.uscourts.gov](mailto:sullivanysdchambers@nysd.uscourts.gov)

Notwithstanding any other provision, no document may be filed under seal without a further Order of this Court. Any application to seal shall be accompanied by an affidavit(s) and a memorandum of law, demonstrating that the standards for sealing have been met and specifically addressing *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006) and any other controlling authority. Nothing herein is intended to alter or modify the applicability of ECF 5.2 to this

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MIRANDA & ESTAVILLO

SO ORDERED

Dated: 11/30/12

*[Signature]*  
RICHARD J. SULLIVAN  
U.S.D.J.

Re: *Princeton Digital Image Corp. v. Hewlett-Packard Co. et al.*,  
Civil Action No. 1:12-cv-00779-RJS

*Princeton Digital Image Corp. v. Facebook Inc. et al.*,  
Civil Action No. 1:12-cv- 06973-RJS

Judge Sullivan,

We represent plaintiff Princeton Digital Image Corp. ("PDIC") in the above-referenced actions. On November 19, 2012, the Court granted the defendants in Civil Action No. 1:12-cv- 06973-RJS permission to file certain portions of their motion to dismiss under seal, for reasons set forth in the Court's Order dated April 24, 2012 from Civil Action No. 1:12-cv-00779-RJS. Certain portions of PDIC's response to the defendants' motion to dismiss refer to the same information ruled protected in the Court's April 24, 2012 Order. Accordingly, PDIC requests to file its response to the defendants' motion to dismiss under seal. A redacted copy has already been filed by ECF.

Respectfully submitted,

*[Signature]*  
R. Terry Parker

cc: All Counsel of Record (via electronic mail)

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DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 12-3-12

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